

EXHIBIT A

AFFIDAVIT OF [REDACTED]

After being duly sworn, [REDACTED] deposes and says as follows:

1. I made this affidavit based on personal knowledge and observations.
2. If I am sworn as a witness, I can testify competently to the facts stated in this affidavit.
3. I was selected as a juror in Case No. 15-cr-20652 in the United States District Court for the Eastern District of Michigan before the Honorable George C. Steeh.
4. I believe that things occurred during deliberations that were inappropriate and misleading.
5. As a result of these concerns I wrote a letter to Judge Steeh to express my concerns, and when I did not hear anything from the court, I contacted a defense attorney, Craig Daly.
6. One of the things that I thought was inappropriate was that one of the jurors, known as “[REDACTED]”, told us that she lived adjacent to the red zone, and that she was very familiar with the area that was described as the red zone at trial.
7. She stated that she had seen graffiti of the Seven Mile Bloods painted on buildings either in her neighborhood or in the adjacent neighborhoods.
8. [REDACTED] repeatedly stated that although she did not know the Defendant's personally, “it was guys like them that were ruining the neighborhood.”
9. She accused other “suburban” jurors as being naive and uninformed because we did not understand what really went on in the Detroit neighborhoods such as the red zone neighborhood or her neighborhood.
10. She used her knowledge and experience from living next to the red zone to influence the other jurors.
11. When it was pointed out to her that we were obligated to judge the case based on the facts

and evidence introduced at trial, she responded that these guys (Defendants) were here for a reason because of what gangs are doing to the city.

12. It was clear that █ had strong opinions regarding gangs and she did not seem interested in discussing how the facts applied to the law, such as whether the Seven Mile Bloods were even an enterprise.

13. There was one occasion where the location of a strip club came up and █ stated that she knew of the club and stated it was at a certain location based on her knowledge of the neighborhood; it was never stated in the trial where the club was, but she used this outside information to try to influence the jurors.

14. It was clear that █ had strong feelings about this case and made it clear that the Defendants, in her words, "had to go down" because of their gang activity.

15. After a couple of days of deliberations, there were 3 jurors, myself included, who were strongly in favor of not guilty and the rest of the jurors were strongly in favor of guilty. A note was sent to the court stating we could not reach a decision.

16. We were brought into the courtroom and the judge told us how to proceed; we were all left with the impression that there were only two choices, "guilty" or "not guilty." From the way the Judge told us to go back into the room, we all believed there was no option of a "hung jury" and so after a week of deliberation, the three jurors gave up, believing we could not change the minds of the nine other jurors. Had we been told that we could "stick to our guns" the court declare a mistrial and start over, I would not have voted for guilty.

17. At one point in the deliberations, the voices got loud and I even pounded on the table. A Marshal came into the jury room and told us we could be heard in the courtroom and to

quiet down. He was white, somewhat tall with some facial hair.

18. While it was somewhat embarrassing to be told to quiet down, that really did not affect me but it may have had an impact on some of the other jurors.

19. It appeared to me that [REDACTED] and another juror, “[REDACTED],” read the Detroit News article about the Seven Mile Bloods because in jury deliberations they were stating facts about the Seven Mile Bloods that were not presented in evidence, and after the trial, I read the article, and then saw how they got those “facts.”

20. In my opinion, the juror who was from the “neighborhood,” [REDACTED], was able to assert disproportionate influence over the other jurors because she claimed to know things first hand.

Under the penalties of perjury, the foregoing information is true to the best of my information, knowledge, and belief, except as to those matters stated to be based on information and belief, and as to those matters, I believe the same to be true.

1/15/19

Date

[REDACTED]

Subscribed and sworn to under oath by [REDACTED] before
me on January 15, 2019 (date).
Notary Public: Desiree Edwards (sign)
Desiree Edwards (print)

County of Commission: Wayne
Acting in the County of Wayne
My commission expires on 3/14/22